

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Advanced Television Systems and	)	MB Docket No. 87-268
Their Impact Upon the Existing	)	
Television Broadcast Service	)	

To: Marlene H. Dortch, Secretary  
Office of the Secretary  
Attn: The Commission

**PETITION FOR RECONSIDERATION OF KAZT, L.L.C.**

KAZT, L.L.C., licensee of television broadcast station KAZT-DT, channel 25, Prescott, Arizona, by counsel and pursuant to Section 1.429 of the Commission's Rules, hereby petitions for reconsideration of the Seventh Report and Order in the above-captioned proceeding, released August 6, 2007 (the "*Seventh Report and Order*"), to the extent set forth herein. For the reasons stated herein, KAZT, L.L.C. requests that the Commission correct the antenna ID set forth in Appendix B, Table of Allotments to the *Seventh Report and Order* to permit KAZT-DT to operate non-directionally as it originally certified.

**DISCUSSION**

In its Pre-Election Certification Form, FCC Form 381, KAZT, L.L.C. certified that it would "neither replicate nor maximize," but would operate its post-transition DTV station with the facilities set forth in its DTV construction permit, FCC File No. BPCDT-19991026ACO. See FCC File No. BCERCT-20041105ALW. That construction permit specifies operation with a non-directional antenna at a height of 850 meters above average terrain ("HAAT") and 50 kilowatts effective radiated power ("ERP"). The licensee chose these operating parameters

because they came closest to matching its existing analog coverage. Thereafter, in the first round channel elections, KAZT, L.L.C. specified channel 7, its current analog channel, for post-transition digital operation. The Commission approved that choice. *See* FCC File No. BFRECT-20050119AED. In accordance with the licensee's certification and channel election, the Commission in its Table of Allotments assigned KAZT-DT channel 7 with 3.2 kilowatts ERP at 850 meters HAAT.<sup>1/</sup> However, the Antenna ID specified for KAZT-DT reflects use of a directional antenna. *See* Statement of Hammett & Edison, Inc., attached hereto as Exhibit A.

KAZT, L.L.C. did not specify a directional antenna. In fact, the licensee intends to operate post-transition using its existing analog antenna, which is non-directional. Absent correction of the antenna pattern in the Table of Allotments, the licensee will be forced to either drastically reduce power in order to maintain the KAZT-DT coverage contour within the directional pattern or incur the substantial cost of purchasing a new directional antenna. Either of these choices would impose an extreme hardship on the licensee -- the first in terms of loss of existing viewers due to the reduction in coverage and the latter in terms of the imposition of an extremely burdensome, unplanned for expense.

---

<sup>1/</sup> The reduction in ERP reflects the change from UHF channel 25 to VHF channel 7.

For these reasons, KAZT, L.L.C. respectfully requests that the Commission correct the antenna ID for KAZT-DT set forth in the Table of Allotments to reflect non-directional operation. As set forth in the attached engineering statement, non-directional operation at 3.2 kilowatts ERP will permit KAZT-DT to “replicate” its certified coverage. Accordingly, correction is critical to the station.

Respectfully submitted,

**KAZT, L.L.C.**

By: /s/ Richard R. Zaragoza  
Richard R. Zaragoza  
Veronica M. Tippet

Its Attorneys

PILLSBURY WINTHROP  
SHAW PITTMAN LLP  
2300 N Street, N.W.  
Washington, D.C. 20037  
(202) 663-8000

Dated: October 26, 2007

## **EXHIBIT A**

## DTV Station KAZT-TV • FCD Channel D07 • Prescott, Arizona

### Statement of Hammett & Edison, Inc., Consulting Engineers

The firm of Hammett & Edison, Inc., Consulting Engineers, has been retained by KAZT, LLC, licensee of DTV Station KAZT-TV, Channel D25/FCD Channel D07, Prescott, Arizona, to prepare an engineering statement in support of its petition for reconsideration of the antenna pattern contained in Appendix B of the Seventh Report and Order to MB Docket 87-268 ("7R&O").\*

### Non-Directional Pre-Election Condition

In its Pre-Election Certification (FCC Form 381), KAZT-TV checked box "e" (neither replicate nor maximize), and specified the facilities in its Construction Permit, FCC File No. BPCDT-19991026ACO. That Construction Permit specified non-directional operation at 850 meters HAAT (on Channel D25 at 50 kW ERP), as listed in the CDBS database.

### Appendix B Incorrectly Specifies Directional Antenna Pattern

In Appendix A to its 7R&O, the Commission adopted a new Table of Allotments for digital television ("DTV"), which assigned DTV Channel 7 to Prescott, Arizona, for post-DTV transition operation. In Appendix B, the Commission proposed technical facilities for that operation and explained its procedures as follows:

"...in cases where a station's assigned DTV channel is not its current DTV channel, [the ERP may be] a value determined by the Commission that will enable the station to provide coverage of the station's service area as specified in the channel election process..."

In cases where the TV Engineering Database indicated employment of a directional antenna, the ERP in each specific direction was determined through linear interpolation of the relative field values describing the directional pattern.

By implication, where a directional antenna is *not* indicated, as is the case for KAZT-TV, a directional antenna pattern should *not* be specified. However, in the Table associated with Appendix B, KAZT-TV (Facility ID No. 35811) was assigned DTV Channel 7 with 3.2 kW ERP at 850 meters HAAT, using Antenna ID 74984. The relative field antenna pattern associated with Antenna ID 74984 is shown in Figure 1.

### Post-Transition Operation Should Be Non-Directional

The licensee of KAZT-TV intends to operate post-transition on DTV Channel 7 using its existing analog antenna, which is non-directional. It appears that the Commission erred when it assigned a

---

\* "Advanced Television Systems and their Impact Upon the Existing Television Broadcast Service," FCC 07-138, released August 6, 2007.



## DTV Station KAZT-TV • FCD Channel D07 • Prescott, Arizona

directional antenna pattern for the post-transition operation of KAZT-TV. It would be a tremendous burden on KAZT-TV to be required to (1) install a new directional antenna for DTV Channel 7 or (2) operate from its existing non-directional antenna at 2.9 dB reduced power below the Appendix B value of 3.2 kW, in order not to extend its noise-limited service contour.

An interference analysis using the Commission's OET-69 method was conducted using the post-transition database of Appendix B. The results of that study indicate that interference would be caused to just one station, KAET-DT, FCD Channel D08, Phoenix, Arizona. The level of predicted interference amounts to 0.034% of the KAET-DT population baseline, which is below the FCC's "de minimis" threshold of 0.1%.

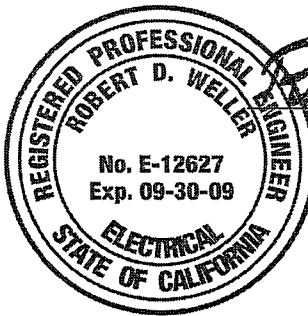
### Summary

Omni-directional operation at 3.2 kW ERP will allow KAZT-TV to "replicate" the coverage certified in its Form 381 filing. The Commission has granted some 30 stations<sup>†</sup> modified coverage areas (and associated FCD technical specifications), so that their post-transition coverage would better match their "certified" coverage from Form 381. It would be appropriate to grant a similar modified coverage area to KAZT-TV, which similarly seeks to match its "certified" coverage.

### List of Figures

In carrying out these engineering studies, the following attached figure was prepared under my direct supervision:

1. Directional antenna pattern specified in Appendix B for DTV Station KAZT-TV.



Robert D. Weller, P.E.

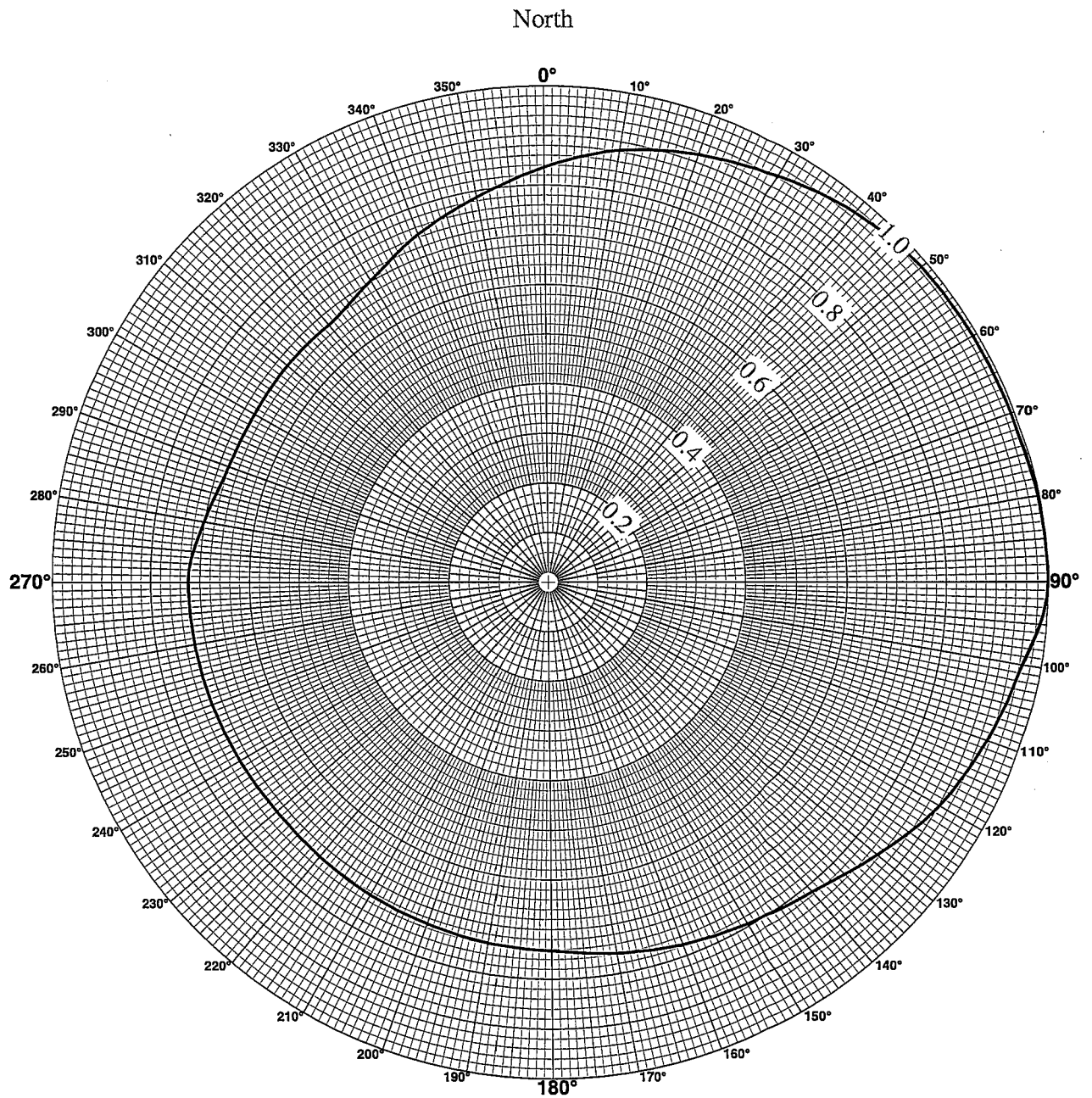
October 25, 2007

<sup>†</sup> 7R&O, para. 62.



DTV Station KAZT-TV • FCD Channel D07 • Prescott, Arizona

Directional Antenna Pattern Specified in Appendix B to the 7R&O  
(Relative Field)



HAMMETT & EDISON, INC.  
CONSULTING ENGINEERS  
SAN FRANCISCO

071024  
Figure 1